



Lake Carriers' Association

The Greatest Ships on the Great Lakes

JAMES H. I. WEAKLEY, PRESIDENT

440-333-9995 • weakley@lcaships.com

May 23, 2012

Via E-Mail: jeff.gray@noaa.gov

Mr. Jeff Gray

National Oceanic and Atmospheric Administration
Office of National Marine Sanctuaries
500 West Fletcher St.
Alpena, MI 49707

Dear Mr. Gray:

SUBJECT: Expansion of Thunder Bay National Marine Sanctuary

Lake Carriers' Association ("LCA") represents 17 American companies that operate 57 U.S.-flag vessels ("lakers") on the Great Lakes and carry the raw materials that drive the nation's economy. Those include iron ore and fluxstone for the steel industry, aggregate and cement for the construction industry, coal for power generation, as well as salt, sand and grain. Collectively, our members can transport more than 115 million tons of dry-bulk cargo per year. They employ more than 1,600 men and women, all of whom are U.S. citizens or legally admitted aliens, and provide annual wages and benefits of approximately \$125 million. In turn, the cargos our members carry generate and sustain more than 103,000 jobs in the United States and have an economic impact of more than \$20 billion.

Our vessels carry countless tons of cargo through the subject sanctuary. Tens of millions of tons of iron ore bound for steelmakers in Michigan, Ohio, Pennsylvania and other states and Canada transit those waters. Millions of tons of coal for power plants along the St. Clair and Detroit Rivers pass through the sanctuary. Calcite (Rogers City) and Stoneport (Presque Isle) are the two largest stone-loading ports on the Lakes, and the cement plant at Alpena is likewise the #1 source on the Lakes.

We continue to applaud the Thunder Bay National Marine Sanctuary's efforts to celebrate our national and regional maritime heritage. Your efforts to protect and preserve the hundreds of shipwrecks within the existing boundary respects the many lives lost "when the waves turn the minutes to hours." We appreciate the homage paid to our modern industry, the companies who carry on the tradition, and the sailors still plying these Great Lakes.

We welcome the expansion of the Sanctuary, provided it can be done in a manner that avoids what we believe could be the "unintended consequences" of applying the restrictions applicable to the current sanctuary to the expanded area. Some of those restrictions are applied by NOAA and others by Coast Guard regulations. The indiscriminant application of the existing restrictions could force commercial vessels to avoid sailing through the area, creating significant economic hardship for our members and reducing the opportunity of Sanctuary visitors to see modern lakers in action. We also believe the limitations on commercial fishing, routine vessel activity or vessel discharges incidental to normal operation would be an unnecessary and unintended consequence of the intended expansion of the Sanctuary. It could also invalidate the work and conclusion of a Coast Guard Environmental Impact Statement and final rulemaking process.

20325 Center Ridge Rd., Ste. 720 ♦ Rocky River, OH 44116 ♦ Fax: 440-333-999 ♦ www.lcaships.com

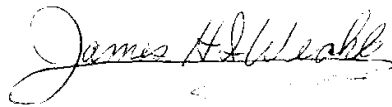
The Association Representing Operators of U.S.-Flag Vessels on the Great Lakes

AMERICAN STEAMSHIP COMPANY ♦ ANDRIE, INC. ♦ ARMSTRONG STEAMSHIP COMPANY ♦ BELL STEAMSHIP COMPANY
CENTRAL MARINE LOGISTICS, INC. ♦ GRAND RIVER NAVIGATION COMPANY, INC. ♦ GREAT LAKES FLEET/KEY LAKES, INC.
INLAND LAKES MANAGEMENT, INC. ♦ THE INTERLAKE STEAMSHIP COMPANY ♦ LAKES SHIPPING COMPANY
LAKE MICHIGAN CARFERRY SERVICE ♦ PERE MARQUETTE SHIPPING ♦ PORT CITY MARINE SERVICES ♦ PORT CITY STEAMSHIP SERVICES
SOO MARINE SUPPLY, INC. ♦ UPPER LAKES TOWING COMPANY, INC. ♦ VANENKEVORT TUG & BARGE INC.

However, we believe our concerns can be accommodated via the rulemaking process. One option would be to limit the vessel operational restrictions currently in place and any proposed to the current geographical boundaries of the Sanctuary.

By working with NOAA and the Coast Guard, we remain confident that the Sanctuary can be expanded to extend recreational opportunities and the protection of our sunken treasures. At the same time, we believe limiting the vessel operating restrictions contained in Coast Guard and NOAA regulations for marine sanctuaries to the current area has no impact on commercial shipping and does not reduce the necessary protections of the Sanctuary in the expanded area. Lake Carriers' Association looks forward to working with NOAA and the Coast Guard as we move forward to ensure a safe, efficient navigation system and the protection of our maritime heritage.

Very Respectfully,

A handwritten signature in dark ink, appearing to read "James H. I. Weakley", written in a cursive style.

James H. I. Weakley
President

Cc: LCA Operations Committee
Bruce Bowie, Canadian Shipowners Association
Capt. Phil Knetchel, Lakes Pilots Association
Capt. Roger Paulus, St. Lawrence Seaway Pilots Association
Capt. Don Willecke, Western Great Lakes Pilots Association